

EXHIBIT 7

Michelle R. Prescott

From: Michelle R. Prescott
Sent: Friday, December 6, 2024 2:43 PM
To: evalenzuela@galipolaw.com; Sierra Frazier; dalekgalipo@yahoo.com
Cc: Christopher Wesierski; Kaitlyn Zendejas
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

You can call me. Use my direct line – 949-258-6404.

Michelle R. Prescott, Esq.
Wesierski & Zurek LLP
29 Orchard Road, Lake Forest, CA 92630
Tel. No. (949) 975-1000
Fax. No. (949) 756-0517
Email mprescott@wzllp.com



Follow us on:

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.

From: evalenzuela@galipolaw.com <evalenzuela@galipolaw.com>
Sent: Friday, December 6, 2024 2:36 PM
To: Michelle R. Prescott <mprescott@WZLLP.COM>; Sierra Frazier <SFrazier@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

****CAUTION: This email originated from outside of the organization.****

Sounds good. I can call you or call me here at the office.

From: Michelle R. Prescott <mprescott@WZLLP.COM>
Sent: Friday, December 6, 2024 2:35 PM
To: evalenzuela@galipolaw.com; Sierra Frazier <SFrazier@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

I am free this afternoon. How about at 3:30?

Michelle R. Prescott, Esq.
Wesierski & Zurek LLP
29 Orchard Road, Lake Forest, CA 92630
Tel. No. (949) 975-1000
Fax. No. (949) 756-0517
Email mprescott@wzllp.com



Follow us on:    

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.

From: evalenzuela@galipolaw.com <evalenzuela@galipolaw.com>
Sent: Friday, December 6, 2024 2:26 PM
To: Michelle R. Prescott <mprescott@WZLLP.COM>; Sierra Frazier <SFrazier@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

****CAUTION: This email originated from outside of the organization.****

Are you available to discuss the case this afternoon or Monday?

From: Michelle R. Prescott <mprescott@WZLLP.COM>
Sent: Friday, December 6, 2024 9:40 AM
To: evalenzuela@galipolaw.com; Sierra Frazier <SFrazier@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

Eric
I'll try and cancel the court reporters but I believe we will incur fees.

Michelle R. Prescott, Esq.
Wesierski & Zurek LLP
29 Orchard Road, Lake Forest, CA 92630
Tel. No. (949) 975-1000
Fax. No. (949) 756-0517
Email mprescott@wzllp.com



Follow us on:    

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by

an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.

From: evalenzuela@galipolaw.com <evalenzuela@galipolaw.com>
Sent: Friday, December 6, 2024 9:31 AM
To: Sierra Frazier <SFrazier@WZLLP.COM>; Michelle R. Prescott <mprescott@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

****CAUTION: This email originated from outside of the organization.****

Will not be going forward.

From: Sierra Frazier <SFrazier@WZLLP.COM>
Sent: Friday, December 6, 2024 9:29 AM
To: evalenzuela@galipolaw.com; Michelle R. Prescott <mprescott@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

Will the experts be appearing today or should I let the court reporting service know they will not be going forward?

Thank you.

Sierra Frazier
Legal Assistant to Michelle R. Prescott, Esq. and Adam M. O'Shea, Esq.
Wesierski & Zurek LLP
29 Orchard Road, Lake Forest, CA 92630
Tel. No. (949) 975-1000
Fax. No. (949) 756-0517
Email sfrazier@wzllp.com



Follow us on:    

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.

From: evalenzuela@galipolaw.com <evalenzuela@galipolaw.com>
Sent: Friday, December 6, 2024 9:02 AM
To: Michelle R. Prescott <mprescott@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Sierra Frazier <SFrazier@WZLLP.COM>; Kaitlyn Zendejas

<kzendejas@WZLLP.COM>

Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

****CAUTION: This email originated from outside of the organization.****

We are agreeable to stip to continue the expert cutoffs. Lets chat today regarding settlement and pretrial issues.

From: Michelle R. Prescott <mprescott@WZLLP.COM>

Sent: Thursday, December 5, 2024 1:26 PM

To: evalenzuela@galipolaw.com; dalekgalipo@yahoo.com

Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Sierra Frazier <SFrazier@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>

Subject: RE: Sostek v. County et al. SBD-00021 - Expert Depositions set for tomorrow - Trial Documents

Eric

I called a couple of times about the expert depositions and left a message. I have those set for tomorrow but was open to rescheduling if we could do a stip to extend the discovery cut off. I haven't heard back from you, so I have to assume you have decided not to stip to extend that deadline. Will your experts be appearing for the depositions tomorrow?

We also have the deadlines coming up for the filing of the exhibit list, status report, witness list and motions in limine. I need to meet and confer with you regarding the MILs. Are plaintiffs intending on filing any MILs?

Michelle R. Prescott, Esq.

Wesierski & Zurek LLP

29 Orchard Road, Lake Forest, CA 92630

Tel. No. (949) 975-1000

Fax. No. (949) 756-0517

Email mprescott@wzllp.com



Follow us on:

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.

From: Michelle R. Prescott

Sent: Wednesday, December 4, 2024 6:11 PM

To: evalenzuela@galipolaw.com; dalekgalipo@yahoo.com

Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Sierra Frazier <SFrazier@wzllp.com>; Kaitlyn Zendejas <kzendejas@wzllp.com>

Subject: RE: Sostek v. County et al. SBD-00021 - Rebuttal Expert Disclosures

Hi Eric

Are you available tomorrow before noon to discuss the settlement demand?

Michelle R. Prescott, Esq.
Wesierski & Zurek LLP
29 Orchard Road, Lake Forest, CA 92630
Tel. No. (949) 975-1000
Fax. No. (949) 756-0517
Email mprescott@wzllp.com



Follow us on: 

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.

From: evalenzuela@galipolaw.com <evalenzuela@galipolaw.com>
Sent: Monday, December 2, 2024 8:48 AM
To: Michelle R. Prescott <mprescott@WZLLP.COM>; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Sierra Frazier <SFrazier@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: RE: Sostek v. County et al. SBD-00021 - Rebuttal Expert Disclosures

****CAUTION: This email originated from outside of the organization.****

We are fine pushing off the expert discovery until after the current board meeting. Lets discuss settlement demand later this week after the court has ruled on the ex parte.

From: Michelle R. Prescott <mprescott@WZLLP.COM>
Sent: Friday, November 29, 2024 11:20 AM
To: evalenzuela@galipolaw.com; dalekgalipo@yahoo.com
Cc: Christopher Wesierski <CWesierski@WZLLP.COM>; Sierra Frazier <SFrazier@WZLLP.COM>; Kaitlyn Zendejas <kzendejas@WZLLP.COM>
Subject: Sostek v. County et al. SBD-00021 - Rebuttal Expert Disclosures

Good morning, Eric,
Attached please find Defendants' rebuttal disclosure. The rebuttal attachment is attached separately to this email. I am working remotely and do not have access to the program to combine these documents.

I believe we discussed pushing off expert discovery until after the current board meeting, but we have not actually filed the stipulation. If you still want to extend the expert discovery until after the current board meeting let me know. As I recall, you were also going to see about getting a lower demand as the last best and final.

Michelle R. Prescott, Esq.
Senior Partner
Wesierski & Zurek LLP
29 Orchard Road, Lake Forest, CA 92630
Tel. No. (949) 975-1000
Fax. No. (949) 756-0517
Email mprescott@wzllp.com



Follow us on: 

Confidential Communication: Emails from this firm normally contain confidential and privileged material and are for the sole use of the intended recipient. Use or distribution by an unintended recipient is prohibited and may be a violation of law. This communication and all attachments are confidential, in anticipation of litigation or in furtherance of litigation. The attorney client privilege, work product doctrine and privacy rights of the sender, recipients and third parties are specifically asserted as to this communication and all attachments, in addition to all other protections afforded by law, including without limitation, HIPAA, physician/patient privilege, trade secret, tax privacy, copyright and trademark laws. If you believe that you received this email in error, please do not read this email or any attached items. Please delete the email and all attachments, including any copies thereof, and inform the sender that you have deleted the email, all attachments and any copies thereof. Thank you.